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August 30, 2002

Mr. James Bartridge  
Project Manager  
California Energy Commission  
Systems Assessment and Facilities Siting Division  
1516 Ninth Street, MS 3000  
Sacramento, CA 95814-5504

1580 Metro Drive

Costa Mesa, CA 92626

Phone: 714.966.9220

Fax: 714.966.9221

Email: costamesa@planningcenter.com

Subject: Comments on Inland Empire Energy Center Application for Certification

VIA: FACSIMILE (916.651.8868) AND AIR MAIL

Dear Mr. Bartridge:

This letter of comments has been prepared by The Planning Center on behalf of the Romoland Elementary School District. The purpose of this letter is to provide comments and questions with reference to the Inland Empire Energy Center (IEEC) Application for Certification (AFC), prepared by Calpine Corporation. We appreciate the efforts of the California Energy Commission staff to assess the concerns identified in this letter and to provide written findings to our comments prior to the approval of the AFC and preparation of the Final Staff Assessment.

1) Land Use

- 1.1 The AFC describes the entire IEEC plant as a 45.8-acre parcel, with 35 acres of the 45.8 acres designated as the actual facility (power plant, switchyard, landscape & access roads), page 3-4. However, throughout the entire AFC, there is no mention about the discrepant 10.8 acres; the AFC fails to identify the location of the 10.8-acre area and to describe the land use of this area. Where is this 10.8-acre area located?
- 1.2 Page 5.11-16, paragraph 3, the AFC indicates, "The proposed 35-acre Energy Center site is designated as Industrial." What about the 10.8 acres? Approximately 1.0 of the 10.8 acres is prime farmland. What is the designation of the remaining 9.8 acres?
- 1.3 Please identify where the 1.0-acre prime farmland is located. There is conflicting information in the AFC. Page 5.6-3 states that the prime farmland is "located near the southeast corner of the project site," while on page 5.6-18 the prime farmland is "located in the southwest corner of the site."
- 1.4 The compressor station will displace 2.6 of 6.6 acres of prime farmland. Where will the compressor be situated within the 6.6 acres? Will it be situated so that the remaining 4 acres could be reused, such as at the southeast corner of the 6.6 acre site at Menifee and Rouse Road?

- 1.5 Table 5.7-3 "Current Land Use, Zoning, Land Use Designations, and Potentially Sensitive Land Uses within the Study Area" (area within one mile of the Energy Center site and ¼-mile of linear facilities) does not include Romoland Elementary School, located less than ¼-mile north of the project site, and Menifee Valley Medical Center, located less than 1 mile south of the project site, at 28400 McCall Blvd. Why have these existing facilities been neglected? The table should be revised to reflect the existence of the elementary school and medical center, as well as all other sensitive land uses within a 1-mile radius of the project site.
- 1.6 In Table 5.7-3, land use designations affected by the project have been listed, but the existing land uses have been omitted. What if there are sensitive receptors located on a parcel that does not have a "sensitive land use" designation according to this table? For instance, the location of the existing Romoland Elementary School is within the designation of Residential.
- 1.7 In Table 5.7-3, the Land Use Designation of Residential is not considered sensitive. Why? Residential areas are considered sensitive when dealing with issues of air quality and noise, two prominent issues in the case of this proposed project.
- 1.8 The report is based on the existing Riverside County General Plan and associated Community Plans. What are the steps that will be taken to reconcile the differences that will arise in this report upon adoption of the new Riverside County General Plan?
- 1.9 One of the steps taken during the update of the Riverside County General Plan was to consolidate the existing 200+ Land Use Designations within the County of Riverside into a more streamlined and easy to decipher smaller set of Land Use Designations. The new draft General Plan has four major Land Use Categories called Foundation Components, and they contain a total of 24 Land Use Designations.

In order to accurately reflect approved Specific Plans within the County, each land use designation within the approved Specific Plan was evaluated and matched to one of the 24 new Land Use Designations. The Menifee North Specific Plan (SP 260) designates the IEEC property as Industrial. The new General Plan has reflected this land use designation as Light Industrial. The new General Plan describes the Light Industrial Land Use as a designation that:

*"allows for a wide variety of industrial and related uses, including assembly and light manufacturing, repair and other service facilities, warehousing, distribution centers, and supporting retail uses. Building intensity ranges from 0.25 to 0.6 FAR."*

The Current Zoning of the IEEC property is in the Specific Plan, which allows for manufacturing uses and industrial parks as well as other uses. Once the new General Plan is adopted, the Zoning designation must be brought into conformance with the General Plan Land Use Designation.

If the General Plan is adopted prior to the approval of the AFC, then it is the responsibility of Calpine to revise the document and ensure conformance with the new General Plan and the new development code. If the AFC is approved prior to the adoption of the new General Plan, the California Energy Commission may have to ensure compliance with the Hearing Draft General Plan per the request of Riverside County Planning Director.

- 1.10 Will permitting be necessary for any linear facilities that do not fall within a public ROW?
- 1.11 Were the proposed Multiple Species Conservation Plan (MSHCP) map and the Community Environmental Transportation Acceptability Process (CETAP) map's (habitat and transportation maps of the RCIP) consulted when deciding on this site? What are the implications of the power plant on these planning programs? Is the power plant consistent with these plans?
- 1.12 Page 5.7-22. The non-reclaimable wastewater pipeline has been cited in an area where there will be residential development of up to 4 DU/AC. Are there possible hazards associated with the placement of this pipeline in proximity to residential development?
- 1.13 The new General Plan may restrict the placement of a pipeline in an area designated as Open Space.
- 1.14 Upon adoption of the new General Plan (slated in early 2003), Ordinance 348 must be brought into conformance with the new plan. The listed zones that would apply to the siting of the power plant would not apply once the new General Plan has been adopted.
- 1.15 Page 5.27-29. This section describes the surrounding land uses, but it does not go into detail about existing land uses in the area. There is land that is designated Residential within one mile of the power plant, and existing dwelling units and a school within the one-mile radius of the proposed site. These land uses are sensitive receptors, and further mitigation measures for noise, local air quality, aesthetics, and design guidelines for the power plant should be discussed.
- 1.16 Section 5.7.14 is about existing land uses, but sections on proposed land uses have been included. This could confuse a reader. The natural gas pipelines, transmission line connections, the non-reclaimable wastewater pipeline, and the compressor station, all proposed, are described in the existing land uses section.
- 1.17 Page 5.7-31, Section 5.7.2.1. The paragraph states that rural residential developments are currently buffered from the proposed site by undeveloped land. This land is designated as residential, and may be developed at any time. The buffer of vacant land between residential and heavy-industrial use is not sufficient. Other mitigation measures should be identified for the proper siting of the energy facility.
- 1.18 The IEEC study states that the siting and operation of the energy center, transmission lines, natural gas pipeline, and wastewater pipeline would, collectively, not affect or result in significant changes to existing land uses or circulation patterns. Some of the surrounding land uses would be greatly

affected by the placement of an industrial use that may emit noise and air pollution into the local area, as well as disturb habitat, agriculture, and circulation.

- 1.19 The AFC points out that all land will be returned to original condition upon completion of linear facilities. Are there unavoidable impacts associated with the installation of linear facilities to land uses such as agriculture and open space? These land uses are easily disturbed, and mitigation measures may be necessary to avoid detrimental effects from temporary construction.
- 1.20 There is a proposed development project approximately 1/4-mile southwest of the proposed energy facility. The project would involve the development of 667 new dwelling units. This sensitive land use may be negatively impacted by the construction, installation, and operation of the energy facility.
- 1.21 Menifee Ranch Specific Plan (SP 301) was adopted in February 2002, after the publication of this document. The Specific Plan calls for a series of uses immediately east of the proposed energy facility site. These uses include residential and other sensitive receptors. The site should be re-evaluated because of the approval of SP 301.
- 1.22 In July of 2001, Riverside County adopted a set of design guidelines applicable to new development within the 3<sup>rd</sup> and 5<sup>th</sup> Supervisorial Districts. Since the proposed site is within the 3<sup>rd</sup> Supervisorial District, these design guidelines contain industrial design policies that encourage the developer to utilize designs and materials that evoke a sense of quality and permanence.
- 1.23 A CETAP transportation corridor has been proposed for the existing rail and Highway 74 that runs south of the site. The right-of-way for that corridor, if the plan is adopted, may affect, or infringe upon the proposed energy facility site.
- 1.24 Although the AFC indicates that the project site is not located within a 100-year flood zone, a review of the FEMA map showed that the 100-year flood zone continues approximately 400 feet north of McLaughlin, into the project site. It appears that the southern portion of the site might potentially be located in the 100-year flood zone. Please clarify the location of south property line of the project site and provide additional discussion and mitigation if the project site is located in the 100-year flood zone?

## 2) Liquid Storage Tanks (page 3-42)

- 2.1 The AFC explicitly discusses four storage tanks: Section 4.3.4 (page 4-8) identifies two water storage tanks: one raw water storage tank with a capacity of 2.1 million gallons and one 250,000 gallon water storage tank for fire protection system, and page 5.12-5 describes two 16,000-gallon aqueous ammonia tanks. Please identify all other storage tanks located within the facility; the type of fluid in the tanks; the capacity of the tanks; and the location of where the tanks would be located at the plant.
- 2.2 No analysis has been prepared for potential seiches, which are generally created by earthquake activity. Seiches are of concern relative to water



storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam or other artificial body of water. If the 2.1 million gallon water storage tank is located on the northern portion of the project site, a seiche may potentially impact Romoland Elementary School. Please provide discussion on such an impact.

- 2.3 The proposed IEEC facility will contain two combustion turbine generators and one condensing steam turbine generator. Calpine should be mindful that there is a school located within ¼-mile of the IEEC plant. Impacts from a propane tank explosion, known as a boiling liquid evaporative explosion, may be significant. Calpine should address the potential hazards related to and safety issues of the generators and allow for public review and comment before approval of the project by the CEC.

### 3) Hazards

- 3.1 If the IEEC AFC were approved, Romoland Elementary School, located at 25890 Antelope Road - less than ¼-mile from the north property line of the plant, would be identified as the closest school located to a power plant in the state of California. Health and safety impacts on sensitive receptors, especially students and staff at Romoland Elementary School, are not adequately addressed in the AFC.
- 3.2 The school is not listed as a sensitive receptor in the noise, land use, or air quality sections of the report; the analyses in these topic areas do not specifically address the school site located ¼-mile from the proposed energy center. Additionally, the public health section seems lacking in coverage of sensitive receptors
- 3.3 The potential impacts of hazards and hazardous materials including VOCs, aqueous ammonia, compressed natural gas and PAHs, should be discussed as it relates to schoolchildren.
- 3.4 The potential impacts of a propane tank explosion should be quantified to assess the potential impacts on the school site.
- 3.5 It is interesting that Alternative Site A (page 3-60), located immediately to the East of the Southern California Edison's Valley Substation, was eliminated because of the following reasons: 1) the area is not currently zoned for industrial development, 2) the area adjacent is planned for residential development, and 3) the planned area adjacent to the Alternative A site may include a high school. The proposed location of the IEEC plant, on Antelope Road, is located south of existing residences, but more importantly, an existing elementary school! Alternative A is still a viable option (although Alternative B appears to be better, being that there are no existing or proposed nearby schools). Alternatives A and B could be rezoned and the residential development and high school planned elsewhere. Romoland Elementary School is a developed and established facility. Relocation of the school would be costly. Moreover, if the IEEC plant were located at either Alternatives A or B, there would be no need for the 162-feet high transmission lines, stretching 0.9 miles in length; the project site would be connected directly to the adjacent substation.

- 3.6 The results of the Off-Site Consequence Analysis (OCA) should be published and available for review before approval of the energy center.
- 3.7 The Level 3 Risk Management Plan including an ammonia hazard analysis, an off-site consequence analysis, a seismic assessment, an emergency response plan, and training procedures should be published and available for review before approval and construction of the energy center.
- 3.8 All conformance reports and studies (page 5.12-18) should be published and available for review before approval and construction of the energy center.
- 3.9 Menifee Valley Medical Center, located less than 1 mile south of the project site, at 28400 McCall Boulevard is a sensitive receptor and should be included in the analysis of section 5.15, Public Health, as well as other applicable sections of the AFC.

4. Natural Gas Pipelines.

- 4.1 Are both Alternative A and B Natural Gas Pipelines 20-inch in diameter? Page 3-64, last sentence of second paragraph indicates the "fuel gas line to the power plant will be 16" in diameter"?
- 4.2 What is the protocol for the selection of either Alternative A or Alternative B natural gas pipelines?

The Alternative B Moreno Valley pipeline is 14.8 miles long. Selection of Alternative B may eliminate potentially good school sites, including a proposed school site at the intersection of Mapes Road and Tradewinds Drive. The proposed Alternative B pipeline would run along Tradewinds through residential uses and a proposed school site.

Selection of the pipeline alternative routes should be carefully considered since selection of one over the other may eliminate land use for future schools. Furthermore, there are three existing high-pressure Sempra natural gas pipelines that run along Menifee Road that are able to supply just as much fuel to the project site.

- 4.3 Title 5, California Code of Regulations §14010(h) states, "The (school) site shall not be located near an above-ground water or fuel storage tank or within 1,500 feet of the easement of an above ground or underground pipeline that can pose a safety hazard." The California Department of Education is concerned about and unlikely to approve school sites located within 1,500 feet of high-pressure natural gas pipelines, in particular in rural areas with new residential development. Approval of this project and subsequent linear facilities may eliminate potential school sites.
- 4.4 How many pounds per square inch (psi) of pressure would the proposed compressor, associated to the Alternative A Pipeline, increase the existing Sempra mainlines 1027, 1028, and 6900, located in Menifee Road? What are the hazards and environmental impacts related to the increase in pressure? Where are the closest shut-off valves for the three mainlines? Are they automatic or manual?

- 4.5 Has a Risk study been prepared for the Alternative A and Alternative B pipelines? If so, it should be included as an appendix in the AFC and available for review before approval of the energy center.
- 4.6 Although no human occupancy currently exists above the proposed Alternative B Moreno Valley pipeline (page 5.5-21), future residential development is planned above and adjacent to the proposed route. Therefore, a fault-rupture hazard study should be prepared, especially since a segment of the pipeline crosses the Casa Loma fault. If the pipeline breaks, communities including schools and other sensitive receptors located around the pipeline would be impacted. Please provide a fault-rupture hazard study to the public and make it available for review before approval of the proposed project.
- 4.7 There are a number of inconsistencies in the AFC related to identifying the Alternative Pipeline routes. Two examples follow:
- "The proposed Alternative A Moreno Valley natural gas pipeline crosses the San Jacinto Core Reserve Area" (page 5.3-3, paragraph 2, sentence 2)
  - "For proposed construction of the Alternative A Menifee Road natural gas pipeline within the study area in the Core Reserve Area (San Jacinto Wildlife Area) all construction along Davis Road..." (page 5.3-38, paragraph 2).

It makes it difficult for the reader to understand what is being conveyed when the writer is not clear. Please make sure accurate identification of Alternative routes is used throughout the AFC.

## 5. Water Pipeline

- 5.1 The proposed project includes implementation of a 4.7-mile long wastewater pipeline. Design of such a pipeline includes a wide margin of safety for the operating water pressures within the pipe, but a severe earthquake, damage by an adjacent construction activity, or highly corrosive conditions in surrounding soils can contribute to leakage or even failure of the pipe. A sudden rupturing of a high-pressure pipeline can result in the release of a large volume of water at the point of failure and fragments of concrete pipe being hurled throughout the immediate area. Subsequent flooding of the immediate area and along the path of drainage to lower ground levels might also occur.
- 5.2 The Romoland School District has proposed a future school located within 1,500 feet of the water pipeline easement. To ensure the protection of students, faculty, and school property, the school district would need to provide answers to the following questions for the California Department of Education when reviewing this future school site:
- The pipeline alignment, size, type of pipe, depth of cover
  - Operating water pressures in pipeline
  - Estimated volume of water that might be released from the pipeline should a rupture occur

6. Air Quality

- 6.1 The air quality analysis relies almost entirely on satisfaction of SCAQMD rules and regulations as the basis for concluding that air quality impacts are acceptable. This interpretation fails to acknowledge that air quality impacts may be adverse while all applicable rules and regulations are being met.
- 6.2 Although regional air quality impacts are quantified, local air quality impacts are not assessed. The document focuses upon impacts at locations as far as 50 miles away, while the analysis contains almost no discussion of local area impact potential from any ground level releases (ammonia, lubricants, dusts, cooling tower particulates, algicides, etc.) of air pollutants and possible local area impacts.
- 6.3 Wind analysis data used to quantify the wind conditions at the project site, discussion of local meteorology, and associated atmospheric dispersion patterns were based on data collected in downtown Riverside. There is substantial variation in wind patterns even over a short distance as reflected in meteorological differences between downtown Riverside and March ARB. The use of inappropriate data again distorts the resulting impact determination.
- 6.4 There is negligible construction activity impact analysis, including no mention of diesel equipment exhaust exposure cancer risk, fugitive dust or truck traffic.
- 6.5 Emissions from diesel truck engines, including particulate matter, should be detailed and analyzed to determine impacts on nearby sensitive receptors, including residences and the elementary school.
- 6.6 The report fails to include any meaningful discussion of ultra-fine diameter particulate matter (PM-2.5) other than to note that PM-2.5 standards are in litigation, and that there is limited baseline PM-2.5 data. That litigation has been settled in several subsequent trials, and California has adopted a state PM-2.5 standard that is not even mentioned in the document. The analysis is based upon PM-10 particulates, but a substantial fraction of project-related particulates are likely to be in the PM-2.5 size range, which has far different health implications.
- 6.7 The suggested PM-10 emissions offsets are from paving dirt roads. Dirt road emission factors are notoriously imprecise, and the emissions that would be eliminated by this measure would be large diameter and substantially inert material, while the generated particulates will be corrosive or otherwise unhealthful. As with much of the rest of the document, the philosophy seems to be that as long as newly generated particulates are offset elsewhere out of the local area according to established rules, local impacts are acceptable even if there is no relation to human health impacts in the process.
- 6.8 The AFC to date has an inadequate cumulative air quality impact regarding operation of the proposed energy center along with the nearby asphalt plant, asphalt recycling, concrete block plant, sewer plant, and other nearby manufacturing or industrial sources in conjunction with the proposed project.
- 6.9 The current document fails to consider environmental justice implications of siting additional heavy industry in an already impacted environment with an economically disadvantaged, minority-dominant community.



- 6.10 Page 3-55 to 3-56 states that in the event of a full shutdown of the power plant, whereby the facility would be operating at base load, "the facility will experience operational limitations including exceedance of air quality limits at outputs below 50 to 60 percent of combustion turbine generators output." Should the CTG operate below 50-60 percent of output, or at threshold where air quality limits would not suffer, especially in the local area, all operations at the entire plant should be halted so that no exceedance of air quality limits occur.

7. Noise

- 7.1 The AFC addresses power plant noise exposure in terms of the General Plan Noise Element standard of 65 dB CNEL, but fails to acknowledge the Riverside County Environmental Health Department (EHD) noise control policy of limiting nocturnal noise to 45 dB LEQ (10-minute average). If the project were required to undergo EHD approval, it would not be approved based upon the far less stringent noise standard used to develop structural noise controls for the project. The County nocturnal noise policy is stated as follows:

The projected acoustical impact of a stationary source on the exterior of an affected property must not exceed the following (W. Redden, Riverside County Dept. of Env. Health [1993]):

- 1) 45-dBA (10-minute LEQ) from 10 p.m. - 7 a.m.
- 2) 65-dBA (10-minute LEQ) from 7 a.m. - 10 p.m.

Please reconsider noise impact mitigation in light of this policy applied to all other stationary noise generators under County use permit authority.

- 7.2 What are typical noise measurements from compressor stations? The surrounding land contains some residential uses, and the placement of a compressor may exceed the noise levels for interior and exterior living areas established by the County.

8. Visual Resources

- 8.1 Scenic Highways contain distinctive natural characteristics. State Route 74 from the Orange County border to the western edge of the San Bernardino National Forest has been designated as an Eligible State Scenic Highway. The intent of such designation is to conserve significant scenic resources for future generations and to manage development along scenic corridors so that it will not detract from the area's natural characteristics. The IEEC facility could be a visual detriment to the immediately adjacent Scenic Highway. A set of Industrial Design Guidelines is suggested.
- 8.2 Page 5.10-24 though 5.10-25 includes five questions and answers related to aesthetics that are generally used to determine aesthetic impacts of a project, per CEQA. None of the answers to the questions mention the fact that State Route 74 is an Eligible State Scenic Highway. Although SR 74 is not an Official State Highway, Calpine should nevertheless be more mindful in the aesthetic value of the area. Development of the project would include structures that would block or disrupt the view of Lakeview Mountains

located northeast of the project site or Double Butte, located east-southeast of the project site.

- 8.3 Page 5.10-27, first bullet on top of page, the additional mitigation measures recommended to eliminate potential significant adverse impacts of the Energy Center and switchyard on views from KOPs 4 and 5 should be included in the AFC. Please publish and make the additional mitigation measures available for review before approval of the energy center.
- 8.4 Figure 5.10-1 is inaccurate. The ¼-mile and ½-mile radius should be measured from the property line of the project site. The figure shows Romoland Elementary School outside the ¼-mile radius of the project site, when in fact the school is located within a quarter mile.
- 8.5 Page 5.10-5 indicates that the Key Observation Points were selected based on the view areas most sensitive to the Energy Center's potential visual impacts. Romoland Elementary School, located less than ¼-mile from the IEEC, should have been selected as a KOP for further analysis. The elementary school is the most immediate sensitive land use to the plant. Currently located between the school site and proposed IEEC facility is vacant land, Highway 74, and an asphalt plant. Schoolchildren attending Romoland Elementary School would have a perfect view of the facility.
9. Miscellaneous
- 9.1 Considerable discussion on the effects of electromagnetic fields on sensitive receptors should be included.
- 9.2 Diamond Valley Dam is located south of the project site. In the event of a dam failure or rupture due to seismic or other events, the project site would most likely be affected, although the 100 and 500-year floodplains have not yet been determined by the state.
- 9.3 The 1990 census income data was used to determine the project area qualified for environmental justice. The 2000 census income data will be available between the end of August and beginning of September. Please update Table 5.8-4 and discussion on income and environmental justice (Sections 5.8.3 – 5.8.5).
- 9.4 Table 5.8-5 indicates that Steve Long at the Riverside County Office of Education was contacted for information. The IEEC plant is located within the Romoland School District (RSD) and Perris Union High School District (PUHSD). Roland Skumawitz, Superintendent of RSD, and Dennis Murray, Superintendent of PUHSD, should have been contacted as well.
- 9.5 Page 5.8-4, Recreation, indicates, "There are no county or state maintained regional parks within a one-mile radius of the project site." There is a school district-county joint use park located south of Romoland Elementary School, approximately 1/8 mile north of the proposed plant. This park should also be considered as a sensitive land use.
- 9.6 Page 5.8-7, Construction Impacts on Education. The AFC indicates that school impact fee is \$0.33 per square foot of commercial and industrial development. Government Code Section 65995(b)(3) requires the

maximum assessment for development be adjusted every two years. In January 2002, the State Allocation Board at its January Board meeting increased the commercial and industrial development fee to \$0.34 per square foot. The AFC indicates that the covered and closed structures to be built will total approximately 12,600 square feet. Accordingly, Calpine shall pay \$4,284 in developer fees.

10. Traffic
- 10.1 How will future traffic/truck traffic volumes affect the existing Romoland Elementary School?
- 10.2 Trip generation estimates were based on a traffic analysis conducted as part of the Menifee North Specific Plan, approved in 1994. Newer generation rates should be used to calculate the number of trips expected to generate from the project.
- 10.3 A 1,600-gallon truckload of aqueous ammonia will be transported to the energy center via Highway 74. The AFC should quantify the potential impacts of a release of the ammonia in relationship to the school site located 1/4-mile from the site and less than 1/8-mile north of Highway 74. Additionally, an emergency response plan should be prepared in the event of a spill.
- 10.4 When was the last RTP update? When is the next update? The AFC may need to be updated to reflect the most current RTP calculations.
- 10.5 What are the projected improvements to I-215, Highway-74, Menifee, and Antelope? Will these improvements affect the proposed project or AADT.
- 10.6 Was the re-alignment of Highway 74 considered when siting for the power plant? The re-alignment of Highway 74 has been proposed for the past 5 or so years. Construction is slated to begin as early as winter 2002. The re-alignment will cause traffic to be temporarily detoured during the construction of the new road, and it will permanently change traffic patterns through the Homeland/Romoland area.
- 10.7 The new Riverside County General Plan has indicated that there are a series of new interchanges planned for Interstate 215. Some of these changes are in proximity to the proposed power plant site. These interchanges may increase traffic through the area. Were these potential traffic increases included when evaluating possible transportation routes of hazardous materials through the area?
- 10.8 There is a railroad crossing at Menifee Road. Is this an at-grade crossing? Could this be a hazard when transporting dangerous materials to and from the proposed plant via truck or rail?
- 10.9 According to the RCIP, Highway 74 has been designated as a CETAP corridor. According to the map that can be found in the Hearing Draft version of RCIP, Volume 3-Area Plans-Harvest Valley/Winchester Area Plan, the ROW for the corridor covers the proposed site. Would the placement of the corridor restrict the placement of the power plant on the proposed site?

- 10.10 The existing Riverside General Plan designates Antelope Road as a Major Highway (with a 100-foot ROW). Will the expansion and paving of this route affect the proposed project?
- 10.11 Will the existing roads have a load limit capacity high enough to hold any truck traffic generated from the construction and regular operation of the proposed project?
- 10.12 Page 5.11-6-The BNSF railroad crosses Ethanac immediately north of the project site. It is an at-grade crossing without any signalization to warn drivers of oncoming trains. According to the AFC, trains travel through the Ethanac intersection approximately 2-3 times per week at 10 MPH. According to the AFC, as cited by RCTC, there are no plans to install signals at this railroad/street crossing. With an increase in the transport of hazardous waste via truck (and possibly train) across this intersection, further study may need to be considered to evaluate the safety of the surrounding sensitive receptors that may be affected by a hazardous spill or explosion due to truck/train collisions.
- 10.13 Are there plans to increase accessibility to public transportation within the proposed project site?
- 10.14 Will the weight and load restrictions currently enforced by the Riverside County General Plan, as listed in the State Motor Vehicle Code, be changed upon adoption of the new General Plan?
- 10.15 Will any of the trucks used during construction or daily operation exceed the weight limit of any of the roads in proximity to the site?
- 10.16 Will trucks traveling to and from the proposed plant pass through residential areas? Have alternate routes been proposed or plotted to ensure that exposure to hazardous materials by sensitive receptors is minimized?
- 10.17 On page 5.11-12 of the AFC the table lists "Spent Catalyst" as a material of waste. What are the contents of Spent Catalyst, and will the transport of 70,000 lbs of this material, on a regular basis, put any sensitive receptors in danger?
- 10.18 5,000 gallons of gas and 5,000 gallons of diesel fuel will be transported to and/or from the power plant every day. Will the route of the trucks bypass any sensitive areas such as schools and residences?
- 10.19 On page 5.11-15, the AFC has evaluated the proposed Energy Plant to determine if the project:
- Causes an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system
  - Exceed, either individually or cumulatively, a level of services standard established by the county congestion management agency for designated roads or highways
  - Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks



- Substantially increase hazards due to a design feature or incompatible uses
- Result in inadequate emergency access
- Result in inadequate parking capacity
- Conflict with adopted policies, plans, or programs supporting alternative transportation

There is no explanation for why some of the listed criteria do not affect the proposed project. Please provide an explanation.

- 10.20 Has the Traffic Control Plan for Construction been completed?
- 10.21 On page 5.11-19, the AFC discusses construction of the gas and wastewater pipelines. During the construction of these linear facilities, will there be considerable off-road use of construction vehicles? What measures will be taken to minimize vehicle impacts on land and within nearby communities. Issues such as fugitive dust and PM10 can become problematic in particularly dry and windy areas of Riverside County. Will there be staging areas where vehicles will be inspected and treated to reduce particulate matter?
- 10.22 What traffic mitigation measures will be taken during the placement of the wastewater and gas pipelines across roadways?

Thank you for the opportunity to comment on the AFC. If you have any questions regarding the comments made in this letter, please call me at 714.966.9220.

Sincerely,

THE PLANNING CENTER



Dwayne Mears, AICP  
Principal